Title VI Plan and Procedures

Title VI of the Civil Rights Act of 1964

Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging

Adopted date

January 22, 2019
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I. INTRODUCTION

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." (42 U.S.C. Section 2000d).

The Civil Rights Restoration Act of 1987 clarified the intent of Title VI to include all programs and activities of Federal-aid recipients, sub-recipients, and contractors whether those programs and activities are federally funded or not.

Recently, the Federal Transit Administration (FTA) has placed renewed emphasis on Title VI issues, including providing meaningful access to persons with Limited English Proficiency.

Recipients of public transportation funding from FTA and the Virginia Department of Rail and Public Transportation (DRPT) are required to develop policies, programs, and practices that ensure that federal and state transit dollars are used in a manner that is nondiscriminatory as required under Title VI.

This document details how Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging incorporates nondiscrimination policies and practices in providing services to the public. Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging’s Title VI policies and procedures are documented in this plan and its appendices and attachments. This plan will be updated periodically (at least every three years) to incorporate changes and additional responsibilities that arise.
II. OVERVIEW OF SERVICES

The Rappahannock Area Agency on Aging d/b/a Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging New Freedom Mobility Management program (known as Mobility Options) is a one-stop-shop clearinghouse for all transportation resources found within Virginia Planning District 16 (the Counties of Caroline, King George, Spotsylvania, Stafford and the City of Fredericksburg.) Program resources include a fixed-route Travel Training Program whose purpose is to train older adults and persons with disabilities to travel safely and independently on the local fixed-route transportation resource in the region (FREDericksburg Regional Transit.) This very successful mobility management program also provides demand-response transportation through the usage of the agency’s wheelchair-accessible fleet vehicles, referrals to private-sector providers, debit cards for fuel purchase and a volunteer driver program option.
III. POLICY STATEMENT AND AUTHORITIES

Title VI Policy Statement

Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging is committed to ensuring that no person shall, on the grounds of race, color, national origin, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (PL 100.259), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity, whether those programs and activities are federally funded or not.

The Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging Title VI Manager is responsible for initiating and monitoring Title VI activities, preparing required reports, and other responsibilities as required by Title 23 Code of Federal Regulations (CFR) Part 200, and Title 49 CFR Part 21.

[Signature] 1/22/19
Signature of Authorizing Official
Date

Authorities

Title VI of the 1964 Civil Rights Act provides that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance (refer to 49 CFR Part 21). The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of the terms “programs or activities” to include all programs or activities of Federal Aid recipients, sub recipients, and contractors, whether such programs and activities are federally assisted or not.

IV. NONDISCRIMINATION ASSURANCE TO DRPT

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from the Federal Transit Administration (FTA) must be accompanied by an assurance that the applicant will carry out the program in compliance with DOT’s Title VI regulations. This requirement is fulfilled when the Virginia Department of Rail and Public Transportation (DRPT) submits its annual certifications and assurances to FTA. DRPT shall collect Title VI assurances from sub-recipients prior to passing through FTA funds.

As part of the Certifications and Assurances submitted to DRPT with the Annual Grant Application and all Federal Transit Administration grants submitted to the DRPT, Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging submits a Nondiscrimination Assurance which addresses compliance with Title VI as well as nondiscrimination in hiring (EEO) and contracting (DBE), and nondiscrimination on the basis of disability (ADA).

In signing and submitting this assurance, Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging confirms to DRPT the agency’s commitment to nondiscrimination and compliance with federal and state requirements.
I hereby acknowledge the receipt of the Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging Title VI Implementation Plan 2018-2021. I have reviewed and approve the Plan. I am committed to ensuring that no person is excluded from participation in, or denied the benefits of transit services on the basis of race, color, or national origin, as protected by Title VI according to Federal Transit Administration (FTA) Circular 4702.1B Title VI requirements and guidelines for FTA sub-recipients.

Karl Karch
Signature of Authorizing Official

01/22/2019
DATE

Karl Karch
Chairman

Rappahannock Area Agency on Aging d/b/a Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging
AGENCY NAME

460 Lendall Lane,
Fredericksburg, VA 22405
www.raaa16.org

Our Service Area:
City of Fredericksburg
Caroline County
King George County
Spotsylvania County
Stafford County

Mobility Options: (540) 656-2985
Phone: (540) 371-3375
Fax: (540) 371-3384
VI. ORGANIZATION AND TITLE VI PROGRAM RESPONSIBILITIES

The Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging’s Mobility Manager is responsible for ensuring implementation of the agency’s Title VI program. Title VI program elements are interrelated and responsibilities may overlap. The specific areas of responsibility have been delineated below for purposes of clarity.

Overall Organization for Title VI

The Title VI Manager and staff are responsible for coordinating the overall administration of the Title VI program, plan, and assurances, including complaint handling, data collection and reporting, annual review and updates, and internal education.

Detailed Responsibilities of the Title VI Manager

The Title VI Manager is charged with the responsibility for implementing, monitoring, and ensuring compliance with Title VI regulations. Title VI responsibilities are as follows:

1. Process the disposition of Title VI complaints received.

2. Collect statistical data (race, color or national origin) of participants in and beneficiaries of agency programs, (e.g., affected citizens, and impacted communities).

3. Conduct annual Title VI reviews of agency to determine the effectiveness of program activities at all levels.

4. Conduct Title VI reviews of construction contractors, consultant contractors, suppliers, and other recipients of federal-aid fund contracts administered through the agency.

5. Conduct training programs on Title VI and other related statutes for agency employees.

6. Prepare a yearly report of Title VI accomplishments and goals, as required.

7. Develop Title VI information for dissemination to the general public and, where appropriate, in languages other than English.

8. Identify and eliminate discrimination.

9. Establish procedures for promptly resolving deficiency status and writing the remedial action necessary, all within a period not to exceed 90 days.
General Title VI responsibilities of the agency

The Title VI Manager is responsible for substantiating that these elements of the plan are appropriately implemented and maintained, and for coordinating with those responsible for public outreach and involvement and service planning and delivery.

1. Data collection

To ensure that Title VI reporting requirements are met, Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging will maintain:

- A database or log of Title VI complaints received. The investigation of and response to each complaint is tracked within the database or log.

- A log of the public outreach and involvement activities undertaken to ensure that minority and low-income people had a meaningful access to these activities.

2. Annual Report and Updates

As a sub-recipient of FTA funds, Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging is required to submit a Quarterly Report Form to DRPT that documents any Title VI complaints received during the preceding quarter and for each year. Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging will also maintain and provide to DRPT an annual basis, the log of public outreach and involvement activities undertaken to ensure that minority and low-income people had a meaningful access to these activities.

Further, we will submit to DRPT updates to any of the following items since the previous submission, or a statement to the effect that these items have not been changed since the previous submission, indicating date:

- A copy of any compliance review report for reviews conducted in the last three years, along with the purpose or reason for the review, the name of the organization that performed the review, a summary of findings and recommendations, and a report on the status or disposition of the findings and recommendations

- Limited English Proficiency (LEP) plan

- procedures for tracking and investigating Title VI complaints

- A list of Title VI investigations, complaints or lawsuits filed with the agency since the last submission

- A copy of the agency notice to the public that it complies with Title VI and instructions on how to file a discrimination complaint

3. Annual review of Title VI program

Each year, in preparing for the Annual Report and Updates, the Title VI Manager will review the agency’s Title VI program to assure implementation of the Title VI plan. In addition, they will
review agency operational guidelines and publications, including those for contractors, to verify that Title VI language and provisions are incorporated, as appropriate.

4. Dissemination of information related to the Title VI program

Information on our Title VI program will be disseminated to agency employees, contractors, and beneficiaries, as well as to the public, as described in the “public outreach and involvement section of this document, and in other languages when needed according to the LEP plan as well as federal and State laws/regulations.

5. Resolution of complaints

Any individual may exercise his or her right to file a complaint if that person believes that he, she or any other program beneficiaries have been subjected to unequal treatment or discrimination in the receipt of benefits/services or prohibited by non-discrimination requirements. Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging will report the complaint to DRPT within three business days (per DRPT requirements), and make a concerted effort to resolve complaints locally, using the agency’s Title VI Complaint Procedures. All Title VI complaints and their resolution will be logged as described under Section 1. Data collection and reported annually (in addition to immediately) to DRPT.

6. Written policies and procedures

Our Title VI policies and procedures are documented in this plan and its appendices and attachments. This plan will be updated periodically to incorporate changes and additional responsibilities that arise. During the course of the Annual Title VI Program Review (item 3 above), the Title VI Manager will determine whether or not an update is needed.

7. Internal education

Our employees will receive training on Title VI policies and procedures upon hiring and upon promotion. This training will include requirements of Title VI, our obligations under Title VI (LEP requirements included), and required data that must be gathered and maintained. In addition, training will be provided when any Title VI-related policies or procedures change (agency-wide training), or when appropriate in resolving a complaint.

Title VI training is the responsibility of Mobility Manager.

8. Title VI clauses in contracts

In all federal procurements requiring a written contract or Purchase Order (PO), Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging’s contract/PO will include appropriate non-discrimination clauses. The Title VI Manager will work with the Finance Director, Executive Director, and Director of Operations who is/are responsible for procurement contracts and PO’s to ensure appropriate non-discrimination clauses are included.
VII. PROCEDURES FOR NOTIFYING THE PUBLIC OF TITLE VI RIGHTS AND HOW TO FILE A COMPLAINT

Requirement to Provide a Title VI Public Notice

Title 49 CFR Section 21.9(d) requires recipients to provide information to the public regarding the recipient’s obligations under DOT’s Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. At a minimum, Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging shall disseminate this information to the public by posting a Title VI notice on the agency’s website and in public areas of the agency’s office(s), including the reception desk, meeting rooms, in federally-funded vehicles, etc. The following Sample Public Notice is to be included as APPENDIX A- Title VI Notice to the Public; List of Locations, and displayed in your vehicles and facilities. Place Notice on agency letterhead:

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance" (42 U.S.C. Section 2000d).

Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transportation services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1B. If you feel you are being denied participation in or being denied benefits of the transit services provided by Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, our contact information is:

Name: Jennifer Falknor  
Title: Mobility Manager  
Agency Name: Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging  
Address: 460 Lendall Lane  
City, State Zip code: Fredericksburg, VA 22405  
Telephone Number: (540) 371-3375  
Email address: titleVI@healthygenerations.org
VIII. TITLE VI COMPLAINT PROCEDURES

Requirement to Develop Title VI Complaint Procedures and Complaint Form.

In order to comply with the reporting requirements established in 49 CFR Section 21.9(b), all recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public. Recipients must also develop a Title VI complaint form. The form and procedure for filing a complaint shall be available on the recipient’s website and at their facilities.

Sample of Narrative

Any individual may exercise his or her right to file a complaint with Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging if that person believes that he or she has been subjected to unequal treatment or discrimination in the receipt of benefits or services. We will report the complaint to DRPT within three business days (per DRPT requirements), and make a concerted effort to resolve complaints locally, using the agency’s Nondiscrimination Complaint Procedures. All Title VI complaints and their resolution will be logged and reported annually (in addition to immediately) to DRPT.

Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging includes the following language on all printed information materials, on the agency’s website, in press releases, in public notices, in published documents, and on posters on the interior of each vehicle operated in passenger service:

The Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color or national origin, as protected by Title VI of the Civil Rights Act of 1964.

For additional information on Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging’s nondiscrimination policies and procedures, or to file a complaint, please visit the website at www.healthygenerations.org or contact Denis Paddeu, Mobility Manager, 460 Lendall Lane, Fredericksburg, VA 22405.

Instructions for filing Title VI complaints are posted on the agency’s website and in posters on the interior of each vehicle operated in passenger service and agency’s facilities, and are also included within Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging’s Mobility Options Transportation Guide brochure.

SEE APPENDIX C-Title VI Complaint Form
Procedures for Handling and Reporting Investigations/Complaints and Lawsuits

Should any Title VI investigations be initiated by FTA or DRPT, or any Title VI lawsuits are filed against Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging the agency will follow these procedures:

Procedures

1. Any individual, group of individuals, or entity that believes they have been subjected to discrimination on the basis of race, color, or national origin may file a written complaint with the Title VI Manager. The complaint is to be filed in the following manner:
   
   a. A formal complaint must be filed within 180 calendar days of the alleged occurrence.
   b. The complaint shall be in writing and signed by the complainant(s).
   c. The complaint should include:
      • the complainant’s name, address, and contact information
      • (i.e., telephone number, email address, etc.)
      • the date(s) of the alleged act of discrimination (if multiple days, include the date when the complainant(s) became aware of the alleged discrimination and the date on which the alleged discrimination was discontinued or the latest instance).
      • a description of the alleged act of discrimination
      • the location(s) of the alleged act of discrimination (include vehicle number if appropriate)
      • an explanation of why the complainant believes the act to have been discriminatory on the basis of race, color, and national origin
      • if known, the names and/or job titles of those individuals perceived as parties in the incident
      • contact information for any witnesses
      • indication of any related complaint activity (i.e., was the complaint also submitted to DRPT or FTA?)
   d. The complaint shall be submitted to the Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging Title VI Manager at 460 Lenadall Lane, Fredericksburg, VA 22405 or titlevi@healthygenerations.org.
   e. Complaints received by any other employee of Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging will be immediately forwarded to the Title VI Manager.
   f. In the case where a complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to the Title VI Manager. Under these circumstances, the complainant will be interviewed, and the Director of Client Services will assist the complainant in converting the verbal allegations to writing.

2. Upon receipt of the complaint, the Title VI Manager will immediately:
   a. notify DRPT (no later than 3 business days from receipt)
   b. notify the Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging Authorizing Official
   c. ensure that the complaint is entered in the complaint database
3. Within 3 business days of receipt of the complaint, the Title VI Manager will contact the complainant by telephone to set up an interview.

4. The complainant will be informed that they have a right to have a witness or representative present during the interview and can submit any documentation he/she perceives as relevant to proving his/her complaint.

5. If DRPT has assigned staff to assist with the investigation, the Title VI Manager will offer an opportunity to participate in the interview.

6. The alleged discriminatory service or program official will be given the opportunity to respond to all aspects of the complainant's allegations.

7. The Title VI Manager will determine, based on relevancy or duplication of evidence, which witnesses will be contacted and questioned.

8. The investigation may also include:
   a. investigating contractor operating records, policies or procedures
   b. reviewing routes, schedules, and fare policies
   c. reviewing operating policies and procedures
   d. reviewing scheduling and dispatch records
   e. observing behavior of the individual whose actions were cited in the complaint

9. All steps taken and findings in the investigation will be documented in writing and included in the complaint file.

10. The Title VI Manager will contact the complainant at the conclusion of the investigation, but prior to writing the final report, and give the complainant an opportunity to give a rebuttal statement at the end of the investigation process.

11. At the conclusion of the investigation and within 60 days of the interview with the complainant, the Title VI Manager will prepare a report that includes a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition. This report will be provided to the Authorizing Official, DRPT, and, if appropriate, Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging's legal counsel.

12. The Title VI Manager will send a letter to the complainant notifying them of the outcome of the investigation. If the complaint was substantiated, the letter will indicate the course of action that will be followed to correct the situation. If the complaint is determined to be unfounded, the letter will explain the reasoning, and refer the complainant to DRPT in the event the complainant wishes to appeal the determination. This letter will be copied to DRPT.

13. A complaint may be dismissed for the following reasons:
   a. The complainant requests the withdrawal of the complaint.
   b. An interview cannot be scheduled with the complainant after reasonable attempts.
   c. The complainant fails to respond to repeated requests for additional information needed to process the complaint.

14. DRPT will serve as the appealing forum to a complainant that is not satisfied with the outcome of an investigation conducted by Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging. DRPT will analyze the facts of the case and will issue its conclusion to the appellant according to their procedures.
A person may also file a complaint directly with the Federal Transit Administration, Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor – TCR, 1200 New Jersey Avenue SE, Washington, DC 20590.

Transportation-Related Title VI Investigations, Complaints, and Lawsuits

Background
All recipients shall prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin:

- Active investigations conducted by FTA and entities other than FTA;
- Lawsuits; and
- Complaints naming the recipient.

This list shall include the date that the transportation-related Title VI investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to the investigation, lawsuit, or complaint. This list shall be included in the Title VI Program submitted to DRPT every three years and information shall be provided to DRPT quarterly and annually.

SEE APPENDIX D- Investigations, Lawsuits and Complaints Document
IX. PUBLIC OUTREACH AND INVOLVEMENT

PUBLIC PARTICIPATION PLAN

Introduction

The Public Participation Plan (PPP) is a guide for ongoing public participation endeavors. Its purpose is to ensure that Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging utilizes effective means of providing information and receiving public input on transportation decisions from low income, minority and limited English proficient (LEP) populations, as required by Title VI of the Civil Rights Act of 1964 and its implementing regulations.

Under federal regulations, transit operators must take reasonable steps to ensure that Limited English Proficient (LEP) persons have meaningful access to their programs and activities. This means that public participation opportunities, normally provided in English, should be accessible to persons who have a limited ability to speak, read, write, or understand English.

In addition to language access measures, other major components of the PPP include: public participation design factors; a range of public participation methods to provide information, to invite participation and/or to seek input; examples to demonstrate how population-appropriate outreach methods can be and were identified and utilized; and performance measures and objectives to ensure accountability and a means for improving over time.

*Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging* established a public participation plan or process that will determine how, when, and how often specific public participation activities should take place, and which specific measures are most appropriate.

*Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging* will make these determinations based on a demographic analysis of the population(s) affected, the type of plan, program, and/or service under consideration, and the resources available. Efforts to involve minority and LEP populations in public participation activities may include both comprehensive measures, such as placing public notices at all transit stations, stops, and vehicles, as well as targeted measures to address linguistic, institutional, cultural, economic, historical, or other barriers that may prevent minority and LEP persons from effectively participating in our decision-making process.

**SOME OF THOSE EFFECTIVE PUBLIC OUTREACH PRACTICES INCLUDES:**

a. Scheduling meetings at times and locations that are convenient and accessible for minority and LEP communities.
b. Employing different meeting sizes and formats.

c. Coordinating with community and faith-based organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities.

d. Considering radio, television, or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations could also include audio programming available on podcasts.

e. Providing opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral comments.

SEE APPENDIX E-Summary of Outreach Efforts
X. LANGUAGE ASSISTANCE PLAN FOR PERSONS WITH LIMITED ENGLISH PROFICIENCY (LEP)

SAMPLE PLAN FOR SERVING PERSONS WITH LIMITED ENGLISH PROFICIENCY (LEP)

LANGUAGE ASSISTANCE PLAN FOR PERSONS WITH LIMITED ENGLISH PROFICIENCY (LEP)

Introduction and Legal Basis

LEP is a term that defines any individual not proficient in the use of the English language. The establishment and operation of an LEP program meets objectives set forth in Title VI of the Civil Rights Act and Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency (LEP). This Executive Order requires federal agencies receiving financial assistance to address the needs of non-English speaking persons. The Executive Order also establishes compliance standards to ensure that the programs and activities that are provided by a transportation provider in English are accessible to LEP communities. This includes providing meaningful access to individuals who are limited in their use of English. The following LEP language implementation plan, developed by Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging is based on FTA guidelines.

As required, Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging developed a written LEP Plan (below). Using American Community Survey (ACS) data, Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging has evaluated data to determine the extent of need for translation services of its vital documents and materials.

LEP persons can be a significant market for public transit, and reaching out to these individuals can help increase their utilization of transit. Therefore, it also makes good business sense to translate vital information into languages that the larger LEP populations in the community can understand.

Assessment of Needs and Resources

The need and resources for LEP language assistance were determined through a four-factor analysis as recommended by FTA guidance.

Factor 1: Assessment of the Number and Proportion of LEP Persons Likely to be Served or Encountered in the Eligible Service Population

The agency has reviewed census data on the number of individuals in its service area that have limited English Proficiency, as well as the languages they speak.
U.S. Census Data – American Community Survey (2011-2015)

Data from the U.S. Census Bureau’s American Community Survey (ACS) were obtained through www.census.gov by Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging’s service area. The agency’s service area includes a total of 11,487 (3.55%) persons with Limited English Proficiency (those persons who indicated that they spoke English less than “very well,” in the 2011-2015 ACS Census). The 2011-2015 ACS data was used due to the lack of LEP by language group data for the 2012-2016 ACS estimates.

Information from the 2011-2015 ACS also provides more detail on the specific languages that are spoken by those who report that they speak English less than very well. Languages spoken at home by those with LEP are presented below. These data indicate the extent to which translations into other language are needed to meet the needs of LEP persons.

**Table 1 - LEP Individuals by Language Spoken**

<table>
<thead>
<tr>
<th>Language</th>
<th>HGAAA Service Area</th>
<th>Percent of Service Area Population Speaking Language</th>
<th>Percent of LEP Population Speaking Language</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spanish or Spanish Creole</td>
<td>7,104</td>
<td>2.19%</td>
<td>61.84%</td>
</tr>
<tr>
<td>Korean</td>
<td>568</td>
<td>0.18%</td>
<td>4.94%</td>
</tr>
<tr>
<td>Chinese</td>
<td>466</td>
<td>0.14%</td>
<td>4.06%</td>
</tr>
<tr>
<td>Vietnamese</td>
<td>455</td>
<td>0.14%</td>
<td>3.96%</td>
</tr>
<tr>
<td>Urdu</td>
<td>325</td>
<td>0.10%</td>
<td>2.83%</td>
</tr>
<tr>
<td>African languages</td>
<td>322</td>
<td>0.10%</td>
<td>2.80%</td>
</tr>
<tr>
<td>French</td>
<td>268</td>
<td>0.08%</td>
<td>2.33%</td>
</tr>
<tr>
<td>Arabic</td>
<td>244</td>
<td>0.08%</td>
<td>2.12%</td>
</tr>
<tr>
<td>Tagalog</td>
<td>212</td>
<td>0.07%</td>
<td>1.85%</td>
</tr>
<tr>
<td>German</td>
<td>172</td>
<td>0.05%</td>
<td>1.50%</td>
</tr>
<tr>
<td>Japanese</td>
<td>168</td>
<td>0.05%</td>
<td>1.46%</td>
</tr>
<tr>
<td>Other Indo-European languages</td>
<td>160</td>
<td>0.05%</td>
<td>1.39%</td>
</tr>
<tr>
<td>Gujarati</td>
<td>138</td>
<td>0.04%</td>
<td>1.20%</td>
</tr>
<tr>
<td>Other Asian languages</td>
<td>122</td>
<td>0.04%</td>
<td>1.06%</td>
</tr>
<tr>
<td>Persian</td>
<td>119</td>
<td>0.04%</td>
<td>1.04%</td>
</tr>
<tr>
<td>Polish</td>
<td>84</td>
<td>0.03%</td>
<td>0.73%</td>
</tr>
<tr>
<td>Russian</td>
<td>64</td>
<td>0.02%</td>
<td>0.56%</td>
</tr>
<tr>
<td>Other Indic languages</td>
<td>57</td>
<td>0.02%</td>
<td>0.50%</td>
</tr>
<tr>
<td>Portuguese or Portuguese Creole</td>
<td>55</td>
<td>0.02%</td>
<td>0.48%</td>
</tr>
<tr>
<td>Language</td>
<td>Count</td>
<td>Percentage</td>
<td>Service Area Percentage</td>
</tr>
<tr>
<td>----------------------------------------------</td>
<td>-------</td>
<td>------------</td>
<td>-------------------------</td>
</tr>
<tr>
<td>Italian</td>
<td>53</td>
<td>0.02%</td>
<td>0.46%</td>
</tr>
<tr>
<td>French Creole</td>
<td>49</td>
<td>0.02%</td>
<td>0.43%</td>
</tr>
<tr>
<td>Hungarian</td>
<td>46</td>
<td>0.01%</td>
<td>0.40%</td>
</tr>
<tr>
<td>Other Pacific Island languages</td>
<td>45</td>
<td>0.01%</td>
<td>0.39%</td>
</tr>
<tr>
<td>Hindi</td>
<td>36</td>
<td>0.01%</td>
<td>0.31%</td>
</tr>
<tr>
<td>Other Slavic languages</td>
<td>33</td>
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<tr>
<td>Thai</td>
<td>32</td>
<td>0.01%</td>
<td>0.28%</td>
</tr>
<tr>
<td>Laotian</td>
<td>27</td>
<td>0.01%</td>
<td>0.24%</td>
</tr>
<tr>
<td>Greek</td>
<td>19</td>
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<td>0.17%</td>
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<td>Other West Germanic languages</td>
<td>18</td>
<td>0.01%</td>
<td>0.16%</td>
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<tr>
<td>Hebrew</td>
<td>13</td>
<td>0.00%</td>
<td>0.11%</td>
</tr>
<tr>
<td>Serbo-Croatian</td>
<td>7</td>
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<td>0.06%</td>
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<tr>
<td>Other Native North American languages</td>
<td>6</td>
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<td>0.05%</td>
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<tr>
<td><strong>Total LEP Population</strong></td>
<td><strong>11,487</strong></td>
<td><strong>3.55%</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Total Service Area Population</strong></td>
<td><strong>324,003</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The most spoken language among LEP individuals is Spanish or Spanish Creole (7,104). No other language group surpasses the Safe Harbor Provision. Figure 1 maps the percentage of LEP individuals by Census Block Group. There are significant percentages of LEP persons in the Fredericksburg, northern Caroline, Spotsylvania County, and Stafford County.

**Figure 1 – % LEP by Census Block Group**
Factor 2: Assessment of Frequency with Which LEP Individuals Come Into Contact with the Transit Services or System

Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging reviewed the relevant benefits, services, and information provided by the agency and determined the extent to which LEP persons have come into contact with these functions through one or more of the following channels:

- Contact with transit vehicle operators;
- Contact with transit station managers;
- Calls to Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging’s customer service telephone line;
- Visits to the agency’s headquarters;
- Access to the agency’s website;
- Attendance at community meetings or public hearings hosted by Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging;
- Contact with the agency’s ADA complementary paratransit system (including applying for eligibility, making reservations, and communicating with drivers).
We will continue to identify emerging populations as updated Census and American Community Survey data become available for our service area. In addition, when LEP persons contact our agency, we attempt to identify their language and keep records on contacts to accurately assess the frequency of contact. To assist in language identification, we use a language identification flashcard based on that which was developed by the U.S. Census. (http://www.lep.gov/ISpeakCards2004.pdf)

Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging provides the following programs, activities and services:

Care Transitions
**EVCPT – Eastern Virginia Care Transitions Partnership**
**COMPAS – Care Options Make for Preferred Solutions**

These programs are made available through a partnership with BayAging, Inc., Mary Washington Hospital, and Rappahannock Area Agency on Aging. This program is provided through professional referrals. For more information contact RAAA.

You can! Live Well, Virginia! (Chronic Disease Self Management Program)

Older adults and people with disabilities are disproportionately affected by chronic illness. According to the 2006 Medical Expenditure Panel Survey, almost 91% of older adults live with at least one chronic condition and almost 75% have at least two. In a 30-day period, people with disabilities experience an average of nine days of restricted activity due to health challenges, more than four times the rate of their counterparts without a disability.

Through the You Can! Live Well, Virginia! Chronic Disease Self-Management Education (CDSME) programs, individuals coping with chronic diseases can take steps to improve their overall health, feel better, and live life to the fullest. The core CDSME program is the Chronic Disease Self-Management Program (CDSMP).

Developed by Stanford University, CDSMP is a six week, 2.5 hour workshop that offers tools and information to help people manage their chronic illnesses and participate more fully in life. There is strong evidence across many studies that CDSMP participants experience several beneficial health outcomes, including greater energy, increased participation in physical activity, improved health status, reduced pain symptoms, and improved psychological well-being. Participants also report enhanced communication and partnerships with physicians and greater confidence that they can take actions to affect their own health.

Long-term, CDSMP has been shown to reduce healthcare costs by decreasing the number of emergency room visits, the number of hospital admissions, and hospital length of stay.

Through this supportive interactive workshop, often led by others with chronic conditions, participants learn about a variety of topics, such as
Healthy eating and exercise choices
Evaluating new treatment choices
Appropriate use of medications
Effective ways to talk with healthcare professionals and loved ones
Most importantly, participants help each other through brainstorming and problem-solving as they develop weekly achievable action plans. Classes are highly participative, where mutual support and success build the participants’ confidence in their ability to manage their health and maintain active and fulfilling lives.

Emergency Services

Providing financial aid and other resources, including referrals to other public and private agencies, to persons 60 and older who have an emergency need for help. The program provides for immediate and short-term assistance in getting resources in an emergency that endangers the health or well-being of older persons.

Eligibility
Persons 60 years of age and older with emergency needs that cannot be met through other services. Priority shall be given to older individuals who are in the greatest economic and social need, with preference given to low-income minority individuals and to those older persons residing in rural or geographically isolated areas.

Homemaker

Homemaker services provide assistance to persons with the inability to perform one or more of the following activities of daily living: preparing meals, shopping for personal items, managing money, using the telephone or doing light housework.

ELIGIBILITY:

Homemaker services are targeted to persons 60 years of age or older who are frail, have disabilities, or who are at risk of institutional placement. Priority shall be given to persons who are in the greatest economic or social need and/or residing in rural or geographically isolated areas, with particular attention to low-income minority individuals and individuals with limited English proficiency.

Information & Assistance (CRIA)

Information and Assistance—The process of assessing a client or caregiver and transferring them to a service provided directly by the agency (RAAA), through a subcontractor, or directly assisting them with obtaining needed services, supports and/or resources and, if necessary, advocating with entities on their behalf.
ELIGIBILITY:

Individuals are eligible for Information and Assistance services if they are 60 years of age or older. Priority shall be given to older individuals who are in the greatest economic and social need, and older individuals at risk for institutional placement, with preference given to low-income minority older individuals, older individuals with limited English proficiency, and older individuals residing in rural areas. Families and caregivers of older adults may also receive information and assistance for needed services.

Virginia Insurance Counseling Assistance Program (VICAP)

Individual insurance counseling assistance is available through the Virginia Insurance Counseling and Assistance Program (VICAP). VICAP counselors at Rappahannock Area Agency on Aging (RAAA) can help you resolve claims or billing problems. They can also assist you with filing for benefits, and sorting through complicated statements and notices. Trained VICAP counselors provide confidential assistance to individuals free of charge. To get in touch with a VICAP counselor contact RAAA.

Legal Services

With funding provided under the Older American’s Act, RAAA provides funding to Rappahannock Legal Services, to support legal assistance to older individuals (60 years of age or older) with economic or social needs.

Long-Term Care Ombudsman

Ombudsmen advocate for older persons receiving long term care services, whether the care is provided in a nursing home or assisted living facility, or through community-based services to assist persons still living at home. We provide older Virginians, their families and the public with information, advocacy, and assistance to help resolve care problems.

Mobility Options

Mobility Options is a grant funded program providing transportation counseling, travel training, and personalized transportation for PD 16. Services may be provided to persons of any age with a physical, developmental, or intellectual disability, or persons that are sixty
(60) years of age or older. A VA Planning District 16 Transportation Resource Guide is available here. If you are interested in more information please call Mobility Options: 1.540.656.2985

Nutrition: Home Delivered Meals

Home Delivered Nutrition is intended to provide dietary support for homebound individuals who are unable to cook or prepare meals for themselves and do not have access to adequate nutrition.

ELIGIBILITY:

Home Delivered Nutrition Services are targeted to persons 60 years of age or older. Priority shall be given to older individuals with greatest economic and social need, with special emphasis on low-income minority individuals, older individuals with limited English proficiency, older persons residing in rural or geographically isolated areas, and older individuals at risk for institutional placement.

Nutrition: Senior Cafes

RAAA’s Senior Cafe’s provide nutritional, social, recreational, and physical activities in addition to transportation, shopping, and events. For more information or to visit a cafe please contact RAAA.

ELIGIBILITY:

Congregate Nutrition Services are targeted to persons 60 years of age or older. Priority shall be given to older individuals with greatest economic and social need, with special emphasis on low-income minority individuals, older individuals with limited English proficiency, older persons residing in rural or geographically isolated areas, and older individuals at risk for institutional placement.

In addition to meeting established eligibility, individuals must be mobile, not homebound, and physically, mentally, and medically able to attend a congregate meals program – without an aide – in accordance with RAAA guidelines.

Older Workers Employment Program (SCSEP)

The Senior Community Service Employment Program has two primary goals:
1. Advance economic self-sufficiency for program participants through employment
training and job placement; and
2. Promote useful opportunities for community service activities through community service employment partnerships.

ELIGIBILITY:

The program has strict eligibility requirements for participants. Only individuals who are 55 or older, unemployed, and have a total family income of less than 125 percent of federal poverty level ($13,613 for a single person household in 2011) are eligible to participate in the program.

In addition, SCSEP grants priority enrollment first to veterans and their qualified spouses, then to individuals who are 65 and older, or:

■ Have a disability,
■ Have limited English proficiency,
■ Have low literacy skills,
■ Live in a rural area,
■ Have low employment prospects,
■ Are unable to find employment through the Workforce Investment Act (WIA) system, or
■ Are homeless or at risk of homelessness.

Telephone Reassurance

Regular, pre-scheduled calls to homebound older adults to reduce isolation and provide routine safety checks.

Transportation

ELIGIBILITY:

Individuals are eligible for Transportation Services if they are 60 years of age or older, lack the ability to transport themselves, and lack other means of transportation. Priority shall be given to older individuals who are in the greatest economic and social need, with preference given to low-income minority individuals and to those older persons residing in rural or geographically isolated areas.

Based on past experience serving and communicating with LEP persons we learned that the following services/routes/programs are currently of particular importance LEP persons in the community.

VICAP – Virginia Insurance Counseling Assistance Program
The following are the most critical services provided by **Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging** for all customers, including LEP persons.

- ADA paratransit services (if your agency operates fixed-route), including eligibility certification process
- Other paratransit services
- Services targeted at low income persons

**Factor 4: Assessment of the Resources Available to the Agency and Costs**

*Costs*

The following language assistance measures currently being provided by **Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging**

- *We are not currently providing translation of documents but, verbal interpretations are always made available utilizing the Language Line Services.*

We anticipate that these activities and costs will remain the same based on the fact that we do not currently provide translation of documents due to the low number of LEP individuals in PD16. As stated previously interpretive services are always available using Language Line Services.

Based on the analysis of demographic data and contact with community organizations and LEP persons, **Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging** has determined that the following additional services are ideally needed to provide meaningful access:

- **Our existing language assistance is sufficient to meet and even exceed demand.**

*Resources*

The available budget that could be currently be devoted to additional language assistance expenses is **$0.00**. This amount is likely to **be stable** over time.

In addition, in-kind assistance may be available through **volunteers which our agency is always recruiting.**

*Feasible and Appropriate Language Assistance Measures*
Based on the available resources, the following language assistance measures are feasible and appropriate for our agency at this time:

- **Language Line Services Telephonic Interpretation.**

**LEP Implementation Plan**

Through the four-factor analysis, **Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging** has determined that the following types of language assistance are most needed and feasible:

**Language Line Services for telephonic interpretation.**

**Staff Access to Language Assistance Services**

Agency staff who come into contact with LEP persons can access language services by calling Language Line Services for assistance. All staff will be provided with a list of available language assistance services and additional information and referral resources (such as community organizations which can assist LEP persons). This list will be updated at least annually.

**Responding to LEP Callers**

Staff who answer calls from the public respond to LEP customers as follows: *by interacting with them utilizing the assistance of Language Line Services.*

**Responding to Written Communications from LEP Persons**

The following procedures are followed when responding to written communications from LEP persons: The recipient will utilize available resources to interpret the communication or will utilize Language Line Services to interact with the person inquiring.

**Responding to LEP Individuals in Person**

The following procedures are followed when an LEP person visits our customer service and administrative office: *Language Line Services is contacted immediately to provide interpretation.*

The following procedures are followed by operators when an LEP person has a question on board a **Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging** vehicle: *Referred to telephone assistance with Language Line Services.*
**Staff Training**

As noted previously, all **Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging** staff are provided with a list of available language assistance services and additional information and referral resources, updated annually.

All new hires receive training on assisting LEP persons as part of their sensitivity and customer service training. This includes:

- A summary of the transit agency’s responsibilities under the DOT LEP Guidance;
- A summary of the agency’s language assistance plan;
- A summary of the number and proportion of LEP persons in the agency’s service area, the frequency of contact between the LEP population and the agency’s programs and activities, and the importance of the programs and activities to the population;
- A description of the type of language assistance that the agency is currently providing and instructions on how agency staff can access these products and services; and
- A description of the agency’s cultural sensitivity policies and practices.

Also, all staff who routinely come into contact with customers, as well as their supervisors and all management staff, receive annual refresher training on policies and procedures related to assisting LEP persons.

**Providing Notice to LEP Persons**

LEP persons are notified of the availability of language assistance through the following approaches:

- **Upon request when interacting with a staff member.**

LEP persons will also be included in all community outreach efforts related to service and fare changes.

**Monitoring/Updating the Plan**

This plan will be updated on a periodic basis (at least every three years), based on feedback, updated demographic data, and resource availability.

As part of ongoing outreach to community organizations, **Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging** will solicit feedback on the effectiveness of language assistance provided and unmet needs. In addition, we will conduct periodic **reviews of Census data and internal meeting will be used to determine**
the adequacy and quality of the language assistance provided, and determine changes to LEP needs.

In preparing the triennial update of this plan, **Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging** will conduct an internal assessment using the Language Assistance Monitoring Checklist provided in the FTA’s “Implementing the Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers.”

Based on the feedback received from community members and agency employees, **Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging** will make incremental changes to the type of written and oral language assistance provided as well as to their staff training and community outreach programs. The cost of proposed changes and the available resources will affect the enhancements that can be made, and therefore **Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging** will attempt to identify the most cost-effective approaches.

As the community grows and new LEP groups emerge, **Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging** will strive to address the needs for additional language assistance.
XI. MINORITY REPRESENTATION ON PLANNING AND ADVISORY BODIES

Title 49 CFR Section 21.5(b)(1)(vii) states that a recipient may not, on the grounds of race, color, or national origin, “deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program.”

Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging has transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which we select.

1. Please provide a description of your selection process, including recruitment efforts made to encourage the participation of minorities on such committee(s)

2. Please provide a table(s) depicting the racial breakdown of the membership of those committees

The Sample below is provided for the purposes of guidance only

<table>
<thead>
<tr>
<th>Committee</th>
<th>Black or African American</th>
<th>White/ Caucasian</th>
<th>Latino/ Hispanic</th>
<th>American Indian or Alaska Native</th>
<th>Asian</th>
<th>Native Hawaiian or other Pacific Islander</th>
<th>Other *Note</th>
<th>Totals</th>
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</thead>
<tbody>
<tr>
<td>Citizens Advisory Committee (CAC)</td>
<td>2</td>
<td>26</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>2</td>
<td>30</td>
</tr>
<tr>
<td>% of CAC Committee</td>
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<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>7.5</td>
<td>100</td>
</tr>
<tr>
<td>Citizens Advisory Committee on Accessible Transportation (CACAT)</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>% of CACAT Committee</td>
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<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

*Note – Other races reported: Lithuania, Ukrainian, and Polish
XII. MONITORING TITLE VI COMPLAINTS

As part of the complaint handling procedure, the Title VI Manager investigates possible inequities in service delivery for the route(s) or service(s) about which the complaint was filed. Depending on the nature of the complaint, the review examines span of service (days and hours), frequency, routing directness, interconnectivity with other routes and/or fare policy. If inequities are discovered during this review, options for reducing the disparity are explored, and service or fare changes are planned if needed.

In addition to the investigation following an individual complaint, the Title VI Manager periodically reviews all complaints received to determine if there may be a pattern. At a minimum, this review is conducted as part of preparing the Annual Report and Update for submission to DRPT.
APPENDIX A - TITLE VI NOTICE TO THE PUBLIC
APPENDIX B - TITLE VI NOTICE TO THE PUBLIC LIST OF LOCATIONS
APPENDIX C - TITLE VI COMPLAINT FORM
APPENDIX D - INVESTIGATIONS, LAWSUITS AND COMPLAINTS DOCUMENT
APPENDIX E - SUMMARY OF OUTREACH EFFORTS
APPENDIX F - TABLE MINORITY REPRESENTATION ON COMMITTEES BY RACE
Appendix A: Title VI Notice to the Public

**Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging** is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transportation services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1B. If you feel you are being denied participation in or being denied benefits of the transit services provided by **Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging**, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, our contact information is:

**Name:** Jennifer Falknor  
**Title:** Mobility Manager  
**Agency Name:** Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging  
**Address:** 460 Lendall Lane  
**City, State Zip code:** Fredericksburg, VA 22405  
**Telephone Number:** (540) 371-3375  
**Email address:** titleVI@healthygenerations.org
Appendix B: List of Locations of Title VI Notice to the Public

All Agency vehicles providing transportation to the Public.
Agency offices
Agency Café's
Title VI Complaint Form

Section I:
Name:
Address:
Telephone (Home): Telephone (Work):
Electronic Mail Address:
Accessible Format Requirements?  □ Large Print  □ Audio Tape
                  □ TDD  □ Other

Section II:
Are you filing this complaint on your own behalf?  □ Yes*  □ No
*If you answered "yes" to this question go to Section III.
If not, please supply the name and relationship
of the person for whom you are complaining:
Please explain why you have filed for a third party:
________________________________________________________________________
________________________________________________________________________

Please confirm that you have obtained the permission of the
aggrieved party if you are filing on behalf of a third party.  □ Yes  □ No

Section III:
I believe the discrimination I experienced was based on (check all that apply):
□ Race  □ Color  □ National Origin
Date of Alleged Discrimination (MM/DD/YYYY)
________________________________________________________________________
Explain as clearly as possible what happened and why you believe you were discriminated against.
Describe all persons who were involved. Include the name and contact information of the person(s)
who discriminated against you (if known) as well as names and contact information of any witnesses. If
more space is needed please use the back of this form
________________________________________________________________________

Section IV:
Have you previously filed a Title VI complaint with this
Agency?  □ Yes  □ No

Section V:
Have you filed this complaint with any other Federal, State,
or local agency, or with or with any Federal or State Court?  □ Yes*  □ No
If yes, check all that apply:
□ Federal Agency: __________________________  □ State Agency: __________________________
□ Federal Court: __________________________  □ Local Agency: __________________________
□ State Court: __________________________
Please provide information about a contact person at the agency/court where the complaint was filed.

Name:
Title:
Agency:
Address:
Telephone:

Section VI:

Name of agency complaint is against:
Contact Person:
Title:
Telephone:

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date required below.

__________________________________________  _________________________
Signature                                      Date

Please use the space below for any additional notes relating to Section III.
### List of Investigations, Lawsuits and Complaints

<table>
<thead>
<tr>
<th>Committee</th>
<th>Black or African American</th>
<th>White/ Caucasian</th>
<th>Latino/ Hispanic</th>
<th>American Indian or Alaska Native</th>
<th>Asian</th>
<th>Native Hawaiian or other Pacific Islander</th>
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<th>Totals</th>
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<tr>
<td>Citizens Advisory Committee (CAC)</td>
<td>2</td>
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<td>0</td>
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<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>7.5</td>
<td>100</td>
</tr>
<tr>
<td>Citizens Advisory Committee on Accessible Transport (CACAT)</td>
<td>0</td>
<td>0</td>
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<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>
Appendix E

Rappahannock Area Agency on Aging d/b/a Healthy Generations Area Agency on Aging makes available on-one-on opportunities for LEP individuals to receive information and includes personal interviews and video and audio recording for oral comments.